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October 3, 2002

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, N.W.,
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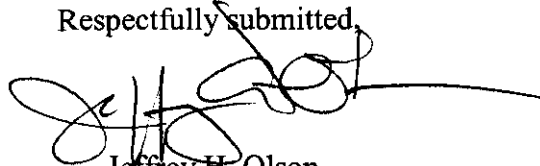
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Notice: IB Docket No. 01-185

Dear Madame Secretary:

On October 2, 2002, Gino Picasso, CEO of Iridium Satellite LLC, Charlene King, Vice President for Corporate Strategy, and the undersigned, attorney for Iridium Satellite, met in person with Samuel Feder, Legal Adviser to Commissioner Martin, to discuss matters relevant to the above-referenced proceedings and the petition for rulemaking filed by Iridium on July 26, 2002. The attached materials were discussed at the meeting.

Respectfully submitted,



Jeffrey H. Olson
Attorney for
Iridium Satellite LLC

Enclosure

cc: Samuel Feder, Esq.
Legal Adviser to Comm. Martin

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BIG LEO BANDS
Existing Allocation Inequities and ATC

1.6 GHz Band

Current Utilization:



Iridium's Redistribution Proposal:



2.4 GHz Band

Current Utilization:



Iridium's existing constellation cannot operate in the 2.4 GHz band.

- It is critical that the Commission provide for an equitable distribution of the 1.6 GHz band, granting Iridium access to substantial additional spectrum, in order to enable Iridium to meet existing and near-term demand.
- The original Big LEO assignments were based on assumptions (4 operating CDMA systems) that have not been realized. Additionally, these assignments imposed technical constraints on the Iridium system (uplinking and downlinking in the same narrow band) not imposed on the other Big LEO systems (or any other MSS system).
- If ATC is permitted, the inequities of the Big LEO allocation and competitive disadvantage to Iridium will be greatly magnified. The requirement that the Iridium system uplink and downlink in the same band (1.6 GHz) places it at a significant disadvantage vis à vis all other MSS systems, which enjoy substantial separation between their uplinks and downlinks. This separation greatly simplifies other MSS systems' ability to provide ATC.
- Even if the requested 6 MHz of additional spectrum is assigned to Iridium, it would remain at a significant competitive disadvantage compared to all other MSS systems, due to the enormous bandwidth advantage that still would be enjoyed by, e.g., Globalstar, and the difficulties inherent in uplinking and downlinking in the same band. Both these inequities would hamstring Iridium's ability to develop a competitive ATC service.